

Steven T. Wax, OSB No. 85012
Federal Public Defender
101 SW Main Street, Suite 1700
Portland, OR 97204
Tel: (503) 326-2123
Fax: (503) 326-5524
Email: steve_wax@fd.org

Lawrence Matasar, OSB No. 74209
621 SW Morrison Street, Suite #1025
Portland, OR 97205
Tel: (503) 222-9830
Email: larry@pdxlaw.com

Attorneys for Defendant

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
EUGENE DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

PIROUZ SEDAGHATY,

Defendant.

CR 05-60008 HO

**DEFENDANT'S THIRD AMENDED
POTENTIAL WITNESS LIST**

Defendant, Pirouz Sedaghaty, by and through his attorneys, Lawrence Matasar and

Federal Public Defender Steven T. Wax, hereby submits the following list of potential witnesses. Mr. Sedaghaty cautions the government in its trial preparation that, at this time, this is only a potential list. He has not yet concluded his investigation and anticipates that there is a reasonable possibility that additional witnesses will be added and that witnesses whose names are on the list will not be called. He may also call no witnesses. As he makes decisions on additions and deletions before trial, he will advise government counsel. To the extent strategic decisions are made about the scope of the defense case during trial, Mr. Sedaghaty will make disclosures as appropriate consistent with his constitutional rights.

POTENTIAL WITNESS	TESTIMONY
George Arnold	Willfulness
Michael Bean	Expert witness on forensic analysis of the hard-drives and email and other document recovery
FBI Agent Joseph Boyer	September 15, 2001, interview with Mr. Sedaghaty
Rob Brown	Willfulness and observations at Al Haramain, Ashland, Oregon and Qu'ran Foundation and willfulness
Caren Caldwell	Willfulness
FBI Agent David Carroll	Testify to meetings with Mr. Sedaghaty and his involvement in the investigation of this case
IRS Agent Kurt Charlton	Interview of Tom Wilcox
Jeff Cone	Expert witness on accounting issues and data recovery
Mark Cox	Expert witness on forensic analysis of the hard-drives and email and other document recovery
Sharon Cummings	Willfulness
Casey Daline, FPD employee	Video review and summary
Ernest Ettlich	Willfulness

Patricia Florin	Willfulness and documents
Mary Foster	Willfulness
Bill Gabriel	Willfulness
Abdi Guled	Observations at Al Haramain, Ashland, Oregon and willfulness
David Hafer	Observations at Al Haramain, Ashland, Oregon and willfulness
Carol Hwoschinsky	Willfulness
Mary Ann Jones	Willfulness
Prof. Tugrul Keskin	Expert witness on Islam Is. review of government exhibits EK 7A and SW
Abdul Quadir Abdul Khaliq	Willfulness, emails, Al Harmain
Anwar Khan, Islamic Relief USA	Willfulness and Chechnya relief
Col. Patrick Lang	Expert witness on terrorism, mujihadeen, Chechnya, Middle Eastern, and intelligence issues
Dr. David Long	Expert witness on legal, political and social history of the Kingdom of Saudi Arabia (KSA) and Islamic legal doctrines
Cathy Matthews	Expert witness on accounting and work of Mr. Wilcox
Marcus Owens	Expert witness IRS tax returns
David Rodgers	Observations at Al Haramain, Ashland, Oregon and Saudi Arabia and Koran Foundation and willfulness
Ben Searcy	Willfulness
Anita Sedaghaty	Willfulness
Raya Shokatfard	Willfulness
FPD Investigator James Strupp	Investigation, receipt and handling of exhibits
Nabil Taha	Willfulness
FPD Chief Investigator William Teesdale	Investigation, receipt and handling of exhibits

Robert Young	Expert witness on forensic analysis of the hard-drives and email and other document recovery
Majdi Zaky	Willfulness
Rabbi David Zaslowsky	Willfulness

RESPECTFULLY SUBMITTED this 17th day of August, 2010.

/s/ Steven T. Wax
Steven T. Wax
Federal Public Defender

/s/ Lawrence H. Matasar
Lawrence H. Matasar